**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

MIRROR WORLDS, LLC 　　　　　　　Plaintiff, 　　v. APPLE INC. 　　　　　　Defendant.	Civil Action No. 6:08-CV-88 LED JURY TRIAL DEMANDED
APPLE INC. 　　　　　　Counterclaim Plaintiff, 　　v. MIRROR WORLDS, LLC, MIRROR WORLDS TECHNOLOGIES, INC., 　　　　　　Counterclaim Defendants.	

**REVISED JOINT CLAIM CONSTRUCTION CHART
PURSUANT TO PATENT LOCAL RULE 4-5(d)**

U.S. Patent No. 6,006,227

Claim Language U.S. Patent No. 6,006,227	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
Claim 1. A computer system which organizes each data unit received by or generated by the computer system, comprising:					
means for generating a <u>main</u> _stream_ of <u>data units</u> and at least one substream, the main stream for receiving each <u>data unit</u> received by or generated by the computer system, and each <u>substream</u> for containing data units only from the main stream;	11	"data unit" '227-1, 13, and 25	"a collection of data of significance to the user that the user considers as a unit."	"an item of information of significance to the user that the user considers as a unit (*e.g.*, an email, picture, voice mail, software program, reminder or calendar item)"	
	1	"stream" '227-1, 13, 25; '313-1; '427-1, 20-24, 25, 37-39	In the '227, '313 and '427 patents: "a time-ordered collection of data units, or documents, unbounded in number, in which the time associated with a data unit can be in the past, present or future, and the location of file storage is transparent to the user"	"a time-ordered sequence of documents that functions as a diary of a person or an entity's electronic life and that is designed to have three main portions: past, present and future"	
	2-1	"main stream" '227-1, 13, 25; and '313-2	"a stream of each data unit, or document, received by or generated by the computer system"	"a stream which stores every data unit, or document, received by or generated by the computer system"	

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	3	"substream" '227-1, 13, 25; '313-2 and 11	"a subset of data units, or documents, yielded by a filter on a stream, the filter identifying certain documents within the stream"	"a stream that is a subset of data units, or documents, yielded by a filter on a stream, the filter identifying certain documents within the stream"	
	10-4	"means for generating a main stream of data units...the main stream for receiving each data unit received by or generated by the computer system" '227-1 and 25	Mirror Worlds asserts that sufficient structure is recited in the element "means for generating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "a main stream of data units ... for receiving each data unit received by or generated by the computer system" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for generating," then: The recited <u>function</u> is generating a main stream of data units. The <u>corresponding structure</u> is computer hardware and executable code implementing a main stream of data units, and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). The recited <u>function</u> is generating a main stream of data units...the main stream for receiving each data unit received by or generated by the computer system. The <u>corresponding structure</u> is computer hardware and software that creates a main stream by linking every existing document in a computer system according to the uniquely identifying timestamp in the document's chronological indicator using a data structure that can be examined and to the extent possible manipulated by many processes simultaneously, and that supports the block-at-the-end operation (and structural equivalents).	
	10-5	"means for	Mirror Worlds asserts that	This is a means-plus-function	

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		generating … at least one substream" '227-1 and 25	sufficient structure is recited in the element "means for generating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "at least one substream ...for containing data units only from the main stream" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for generating," then: The recited <u>function</u> is generating at least one substream. The <u>corresponding structure</u> is computer hardware and executable code implementing substreams, and equivalents thereof.	limitation subject to § 112(6). The recited <u>function</u> is generating at least one substream … each substream for containing data units only from the main stream. The <u>corresponding structure</u> is computer hardware and software that runs a search of a stream using a boolean attribute-and keyword expression or a 'chronological expression' and generates another stream having the results of the search, using a data structure that can be examined and to the extent possible manipulated by many processes simultaneously, and that supports the block-at-the-end operation (and structural equivalents).	
means for receiving data units from other computer systems;	10-5	"means for receiving data units from other computer systems" '227-1	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is receiving data units from other computer systems. The <u>corresponding structure</u> is computer hardware and	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is receiving data units from other computer systems. The <u>corresponding structure</u> is computer hardware and	

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			executable code that receives data units from other computer systems over a network connection, and equivalents thereof.	software for receiving data from other computer systems through electronic mail, World Wide Web, the Internet, or copying from steams in another computer system (and structural equivalents).	
means for generating data units by the computer system;	10-6	"means for generating data units by the computer system" '227-1	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is generating data units by the computer system. The <u>corresponding structure</u> is executable code that creates data units, and equivalents thereof.	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is generating data units by the computer system. The <u>corresponding structure</u> is computer hardware running conventional UNIX applications such as emacs, xv, and ghostview (and structural equivalents), or software that creates documents by either cloning an existing document and adding it to the main stream, or creating a new empty document and adding it to the main stream (and structural equivalents).	
means for selecting a <u>timestamp to</u>	5	"timestamp	"a time-based identifier"	"a date and time value that	

Claim Language U.S. Patent No. 6,006,227	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
identify each data unit;		to identify" '227-1, 13, and 25		uniquely identifies each document"	
	10-1	"means for selecting a timestamp to identify each data unit" '227-1	The parties agree that the recited <u>function</u> is selecting a timestamp to identify each data unit. The <u>corresponding structure</u> is executable code that selects the timestamp for a data unit based on the present time or a time designated by the user, and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is selecting a timestamp to identify each data unit. There is no <u>corresponding structure</u>. This limitation is indefinite.	
means for associating each data unit with at least one chronological indicator having the respective timestamp;	10-2	"means for associating each data unit with at least one chronological indicator having the respective timestamp" '227-1	Mirror Worlds asserts that sufficient structure is recited in the element "means for associating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "each data unit" "timestamp" "chronological indicator having a respective timestamp" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means	This is a means-plus-function limitation subject to § 112(6). In 227-1, the parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is associating each data unit with at least one chronological indicator having the respective timestamp. The <u>corresponding structure</u> is computer hardware and software that associates a separate chronological indicator with every document received or generated by the	

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			for associating," then: The parties agree that the recited <u>function</u> is associating each data unit with at least one chronological indicator having a respective timestamp. The <u>corresponding structure</u> is executable code implementing the main stream, and equivalents thereof.	computer system and puts the uniquely identifying timestamp for that document into the chronological indicator (and structural equivalents).	
means for *including each data unit according to the timestamp in the respective <u>chronological indicator</u> in the main stream*; and		"chronological indicator" '227-1, 13, 25; and '427-25	"a data structure containing at least a timestamp"		AGREED
	2-2	"including each data unit according to the timestamp in the respective chronological indicator in the main stream" '227-1, 13, and 25	No construction is necessary. However, if the Court rules that one is necessary, Mirror Worlds proposes the following construction: "including each data unit in the main stream, ordered according to the time stamp in the respective chronological indicator"	"storing each document in the main stream, in the location required by its identifying timestamp"	
	10-7	"means for including	The parties agree that this is a means-plus-function	The parties agree that this is a means-plus-function	

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		[each data unit according to the timestamp in the respective chronological indicator in the main stream]" '227-1, 25	limitation subject to § 112(6). The parties agree that the recited <u>function</u> is including each data unit according to the timestamp in the respective chronological indicator in the main stream. The <u>corresponding structure</u> is executable code implementing the main stream, and equivalents thereof.	limitation subject to § 112(6). The parties agree that the recited <u>function</u> is including each data unit according to the timestamp in the respective chronological indicator in the main stream. The <u>corresponding structure</u> is computer hardware and software that adds every document received or generated by the computer system into a main stream according to the uniquely identifying timestamp in the document's chronological indicator using a data structure that can be examined and to the extent possible manipulated by many processes simultaneously, and that supports the block-at-the-end operation (and structural equivalents).	
means for maintaining the main stream and the substreams as <u>persistent streams</u>.	10-8	"means for maintaining the main stream and the substreams as persistent	The parties agree that this is a means-plus-function limitation subject to § 112(6). The recited <u>function</u> is maintaining the main stream and the substreams as persistent streams.	The parties agree that this is a means-plus-function limitation subject to § 112(6). The recited <u>function</u> is maintaining the main stream as a persistent stream. The <u>corresponding structure</u> is	

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		streams" '227-1 and 25	The corresponding structure is executable code that dynamically updates the main stream and executable code that dynamically updates substreams, and equivalents thereof.	computer hardware and software that adds every document received or generated by the computer system into a main stream according to the uniquely identifying timestamp in the document's chronological indicator using a data structure that can be examined and to the extent possible manipulated by many processes simultaneously, and that supports the block-at-the-end operation (and structural equivalents). The recited function is maintaining the substreams as persistent streams. The corresponding structure is computer hardware and software that act as a filter by examining each new document that enters the main stream using the search criteria from each substream that has been created and not destroyed and that adds documents that match those search criteria to the appropriate stream (and	

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				structural equivalents).	
		"persistent streams" '227-1 and 13	"streams that are dynamically updated"		AGREED
5. The computer system of claim 1, wherein said means for receiving further comprises means for receiving data units from a **client computer**.		"client computer" '227-5	"a computer acting as a client in a client/server architecture"		AGREED
6. The computer system according to claim 1, further comprising:					
means for displaying alternative versions of the content of the data units.	10-9	"means for displaying alternative versions of the content of the data units" '227-6	Mirror Worlds asserts that sufficient structure is recited in the element "means for displaying" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "alternative versions of the content of the data units" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for displaying," then: The parties agree that the	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is displaying alternative versions of the content of the data units. The <u>corresponding structure</u> is computer hardware and software that displays the X Window System window shown in Fig. 1, including specifically the alternative	

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			recited <u>function</u> is displaying alternative versions of the content of the data units. The <u>corresponding structure</u> is browse cards/glance views, and equivalents thereof.	version of a document shown as 100, which was created using 'header stripping' to identify the first non-trivial words in a document, or using complex analysis that identifies the 'most important' words, pictures, and/or sounds in the document (and structural equivalents).	
9. A computer system according to claim 1 further comprising:					
means for archiving a data unit associated with a timestamp older than a specified time point while retaining the respective chronological indicator and/or a data unit having a respective alternative version of the content of the archived data unit.	10-10	"means for archiving a data unit associated with a timestamp older than a specified time point while retaining the respective chronological indicator and/or a data unit having a respective	Mirror Worlds asserts that sufficient structure is recited in the element "means for archiving" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "archiving a data unit associated with a timestamp older than a specified time point" "retaining the respective chronological indicator and/or a data unit having a respective alternative version of the content of the archived data unit" If, however, the court	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is archiving a data unit associated with a timestamp older than a specified time point while retaining the respective chronological indicator and/or a data unit having a respective alternative version of the content of the archived data unit. The <u>corresponding structure</u> is computer hardware and	

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		alternative version of the content of the archived data unit" '227-9	determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for archiving," then: The parties agree that the recited <u>function</u> is archiving a data unit associated with a timestamp older than a specified time point while retaining the respective chronological indicator and/or a data unit having a respective alternative version of the content of the archived data unit. The <u>corresponding structure</u> is computer hardware and executable code implementing archiving of data units, and equivalents thereof.	software that monitors remaining disk space, and when available space is low, automatically moves all documents older than some date from immediately accessible storage to cheaper, long-term storage, after asking the user to insert diskettes or other storage media if necessary (and structural equivalents).	
10. The computer system of claim 1, wherein the computer program further comprises:					
means for operating on any of the streams using a set of operations selected by a user.	10-11	"means for operating on any of the streams using a set of operations selected by a	Mirror Worlds asserts that sufficient structure is recited in the element "means for operating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "a set of operations selected	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is means for operating on any of the	

Claim Language U.S. Patent No. 6,006,227	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
		user" '227-10	by a user" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for operating," then: The parties agree that the recited <u>function</u> is operating on any of the streams using a set of operations selected by a user. The <u>corresponding structure</u> is executable code implementing user selectable operations on streams, and equivalents thereof.	streams using a set of operations selected by a user. The <u>corresponding structure</u> is computer hardware running software which is capable of performing any of the "new," "clone," "transfer," "find," "summarize," copy, merge, print, and freeze operations on a stream (and structural equivalents).	
11. The computer system of claim 1 further comprising:					
means to generate substreams from existing substreams.	10-12	"means to generate substreams from existing substreams" '227-11	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is to generate substreams from existing substreams. The <u>corresponding structure</u> is executable code implementing incremental substreams, and equivalents thereof.	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is to generate substreams from existing substreams. The <u>corresponding structure</u> is computer hardware running software that runs a search of a substream using a Boolean attribute-and-keyword	

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				expression or a 'chronological expression' and generates another stream having the results of the search, using a data structure that can be examined and to the extent possible manipulated by many processes simultaneously, and that supports the block-at-the-end operation (and structural equivalents).	
12. A computer system as in claim 1, further comprising:					
means for generating a data unit comprising an alternative version of the content of another data unit; and	10-13	"means for generating a data unit comprising an alternative version of the content of another data unit" '227-12	The parties agree that the recited <u>function</u> is generating a data unit comprising an alternative version of the content of another data unit. The <u>corresponding structure</u> is executable code implementing alternative versions of data units, and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is generating a data unit comprising an alternative version of the content of another data unit. The <u>corresponding structure</u> is computer hardware and software that creates an alternative version of a document for use in archiving that remains in the computer system when the another document has been archived	

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				(and structural equivalents).	
means for associating the alternative version data unit with the chronological indicator of the another data unit.	10-14	"means for associating the alternative version data unit with the chronological indicator of the another data unit." '227-12	The parties agree that the recited <u>function</u> is associating the alternative version data unit with the chronological indicator of the another data unit. The <u>corresponding structure</u> is executable code implementing alternative versions of data units, and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is associating the alternative version data unit with the chronological indicator of the another data unit. The <u>corresponding structure</u> is computer hardware and software that takes the chronological indicator associated with the another document and associates it with the alternative version data unit for use in archiving (and structural equivalents).	
13. A method which organizes each data unit received by or generated by a computer system, comprising the steps of:					
generating a main stream of data units and at least one substream, the main					

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stream for receiving each data unit received by or generated by the computer system, and each substream for containing data units only from the main stream;					
receiving data units from other computer systems;					
generating data units in the computer system;					
selecting a timestamp to identify each data unit;					
associating each data unit with at least one chronological indicator having the respective timestamp;					
including each data unit according to the timestamp in the respective chronological indicator in at least the main stream;					

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and					
maintaining at least the main stream and the substreams as persistent streams.					
15. The method of claim 13, further comprising the step of displaying the streams on a display device as **visual streams**.		"visual streams" '227-15, 26 and 28	"a representation on a display device of a stream"		AGREED
20. The method of claim 13, further comprising the step of:					
displaying data from one of the data units in **abbreviated form**.	13-1	"abbreviated form" '227-20	No construction is necessary. However, if the Court rules that one is necessary, Mirror Worlds proposes the following construction: "a form or version that is less than the full form or version"	"a shortened version of the content to be displayed from the data unit or document"	
25. A computer system for organizing each data unit received by or generated by the computer system, comprising:					

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means for generating a main stream of data units and at least one substream, the main stream for receiving each data unit received by or generated by the computer system, and each substream for containing data units only from the main stream; **means for associating each data unit with at least one chronological indicator having a respective timestamp which identifies the data unit**; means for including each data unit according to the timestamp in a respective chronological indicator in the main stream; means for maintaining the main stream and the substreams as a	10-2	"means for associating each data unit with at least one chronological indicator having a respective timestamp which identifies the data unit" '227-25	Mirror Worlds asserts that sufficient structure is recited in the element "means for associating" to take this element outside the constraints of 35 U.S.C. § 112, ¶ 6. "each data unit" "timestamp" "chronological indicator having a respective timestamp" If, however, the court determines that 35 U.S.C. § 112, ¶ 6 applies to the "means for associating," then: The recited <u>function</u> is associating each data unit with at least one chronological indicator having a respective timestamp. The <u>corresponding structure</u> is executable code implementing the main stream, and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). In '227-25, the recited <u>function</u> is associating each data unit with at least one chronological indicator having a respective timestamp which identifies the data unit. There is no <u>corresponding structure</u>. This limitation is indefinite.	

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persistent streams;					
means for representing one or more data units of a selected stream on a display device as document representations, each document representation including the timestamp of the respective data unit and the order of appearance of each data representation on the display device determined by the timestamp of the respective data unit;		"document representation" '227-25; '427-1, 8, 16, 25, and 32	"a graphical depiction of a document, or data unit"		AGREED
	10-15	"means for representing one or more data units of a selected stream on a display device as document representations ... the order of appearance of each data representation on the display device determined by the timestamp of the respective data unit"	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is representing one or more data units of a selected stream on a display device as document representations, each document representation including the timestamp and the order of appearance of each data representation on the display device determined by the timestamp of the respective data unit). The <u>corresponding structure</u> is the graphical stream view, and equivalents thereof.	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is representing one or more data units of a selected stream on a display device as document representations, each document representation including the timestamp and the order of appearance of each data representation on the display device determined by the timestamp of the respective data unit). The <u>corresponding structure</u> is computer hardware and software that displays the X Windows System window shown in Fig. 1 and creates the necessary document representations (and structural	

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		'227-25		equivalents).	
means for selecting which data units are represented on the display device by selecting one of the document representations and displaying document representations corresponding to data units having timestamps within a range of a timepoint; and	10-3	"means for selecting which data units are represented on the display device by selecting one of the document representations and displaying document representations corresponding to data unit having timestamps within a range of a timepoint" '227-25	The parties agree that the recited <u>function</u> is selecting which data units are represented on the display device by selecting one of the document representations and displaying document representations corresponding to data units having timestamps within a range of a timepoint. The <u>corresponding structure</u> is the graphical stream view , and equivalents thereof.	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the recited <u>function</u> is selecting which data units are represented on the display device by selecting one of the document representations and displaying document representations corresponding to data units having timestamps within a range of a timepoint. There is no <u>corresponding structure</u>. This phrase is indefinite.	
means for selecting one or more of the document representations with a pointing device so that the	10-16	"means for selecting one or more of the document representations with a	The parties agree that the recited function is selecting one or more of the document representations with a pointing device so that the data units represented by the	This is a means-plus-function limitation subject to § 112(6). The parties agree that if the court determines that 35 U.S.C. § 112, ¶ 6 applies, the	

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data units represented by the selected document representations are further displayed with a second document representation comprising an alternative version of the content of the respective data unit.		pointing device [so that the data units represented by the selected document representations are further displayed with a second document representation comprising an alternative version of the respective data unit]" '227-25	selected document representations are further displayed with a second document representation comprising an alternative version of the respective data unit. The <u>corresponding structure</u> is the graphical stream view, and equivalents thereof.	recited <u>function</u> is selecting one or more of the document representations with a pointing device so that the data units represented by the selected document representations are further displayed with a second document representation comprising an alternative version of the respective data unit. The <u>corresponding structure</u> is computer hardware, including a mouse and a video display screen, and software that (1) creates a 'glance' view of documents using header-stripping to include the first non-trivial words of the document, or using complex analysis to include the most important words, pictures and/our sounds, (2) receives input from the mouse and displays a mouse pointer on the display device so that the user can slide the mouse pointer over the displayed document representations; and (3) that displays the glance view of a document in	

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				response to the mouse pointer selecting that document by touching its document representation.	
26. A computer system as in claim 25, wherein the document representations form a visual stream having a three-dimensional effect.					
27. A computer system as in claim 26, wherein the **three-dimensional effect** further comprises a **perspective view**.		"three-dimensional effect" '227-26	"an effect that suggests the presence of a third dimension in a flat display"	AGREED	AGREED
		"perspective view" '227-27	"a two dimensional representation that creates the illusion of a three-dimensional object"	AGREED	AGREED
29. A computer system as in claim 25, wherein the alternative version is an **abbreviated version**.	13-1	"abbreviated version(s)" '227-29; '313-1, 9; '427-5, 13, 22, 29 and 37	No construction is necessary. However, if the Court rules that one is necessary, Mirror Worlds proposes the following construction: "a form or version that is less than the full form or version"	"a shortened version of the content to be displayed from the data unit or document"	

U.S. Patent No. 6,725,427

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
Claim 1: **A stream-based operating system** utilizing subsystems from another operating system running a computer, comprising:		"operating system" '313-1, 10; '427-1, 8, 16, and 25	"the software that handles basic computer operations (e.g. managing input/output, memory, applications, etc.) and presents an interface to the user"		AGREED
	4	"stream-based operating system" '427-1	"an operating system that includes support for streams"	"a non-hierarchical operating system in which, as each document is presented to the operating system, the document is placed according to a time indicator in the sequence of documents already stored relative to the time indicators of the stored documents"	

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
a **document organizing facility** receiving **documents** created by diverse applications in diverse formats specific to the respective applications;		"document" '313-1, 9; '427-1, 8, 16, 25, and 32	Except as set forth below, "document" means "a data unit, as defined herein. In certain places, listed below, "document" means "a document representation" as defined below: '313 claim 1 at 15:25, 15:25, 15:26; 15:31, 15:33 (*i.e.*, in the fifth and sixth paragraphs of the claim after the preamble); '313 claim 9 at 16:28, 16:28, 16:29; 16:34 (*i.e.*, in the final two paragraphs of the claim).		AGREED

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
	9	"document organizing facility" '427-1, 8, 16, and 25	"software that organizes documents"	Document organizing facility is a means-plus-function limitation subject to § 112(6). Recited functions and structure are set forth below. Alternatively, if the Court finds this is not a means-plus-function limitation, Apple proposes the following construction: "the portion of a stream-based operating system whose purpose is to organize documents" In '427-1 and '427-8, the recited functions are: (a) receiving documents created by diverse applications in diverse formats specific to the respective applications; (b) automatically associating [respective] selected indicators with the received documents; (c) automatically archiving the documents and indicators in consistent format for selective retrieval; and (d) automatically creating information specifying respective glance views of said documents and respective document	

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
				representations of said documents. There is no corresponding structure. This phrase is indefinite.	
said document organizing facility automatically associating respective **selected indicators** with the received documents,		"selected indicators" '427-1, 8, and 16	"data structures that contain information relating to respective documents"		AGREED
automatically **archiving the documents and indicators in consistent format for selective retrieval**, and	8	"archiving" '313-1, 9; '427-1 and 8	"copying documents to a secondary storage medium"	"moving from immediately-accessible storage to long-term storage"	
	13-2	"archiving the documents and indicators in consistent format for selective retrieval" '427-1 and 8	This term is readily understood and no construction is necessary. However, if the Court rules that one is necessary, Mirror Worlds proposes the following construction: "archiving documents and indicators in a consistent format that enables uniform selective retrieval of the documents."	"archiving the documents and indicators in a consistent format rather than the diverse formats appearing in conventional directors and subdirectories of files"	

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
automatically creating information specifying respective **glance views** of said documents and respective document representations of said documents;	6	"glance views" '313-1, 9; '427-1, 8, and 16	"an abbreviated presentation of a document"	"a different graphical representation of a document that appears when a document representation is touched by the cursor or pointer and provides additional information about the document"	
a display facility displaying at least selected document representations as a **receding, foreshortened stack** of partly overlapping document representations such that only a part of each displayed document representation, after the first in the stack, is visible to the user;	7	"receding foreshortened stack" '313-1, 9; '427-1, 10, 18, and 25	"a representation of a stack that uses perspective to create the illusion of increasing distance from the viewpoint implied by the image"	"a stack where the document representations get smaller, and appear farther from the surface of the screen, toward the bottom of the stack"	
said display facility further displaying a					

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
cursor or pointer and responding to user-controlled sliding without clicking of the cursor over said displayed stack to display a glance view of a document whose document representation is currently touched by the cursor or pointer; and					
said stream-based operating system utilizing subsystems from said another operating system for operations including writing documents to storage media, **interrupt** handling and input/output.		"interrupt" '427-1, 8, and 16	"an external signal to a program or process that may cause the program or process to take some action"		AGREED
7. A stream-based operating system as in claim 1 in which said	13-4	"complex analysis" '427-7, 15, 24,	"analysis involving the form, content and/or type of a document"	"analysis of the content of a document that allows selection of important words, pictures, and/or sounds in the	

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
display of a glance view comprises important words, pictures, and/or sounds of the respective document resulting from **complex analysis** of the document.		31, and 39		document"	
8. A **controlling operating system** utilizing subsystems from another operating system running a computer, comprising:	13-3	"controlling" operating system '427-8 and 16	"an operating system that utilizes subsystems from another operating system"	"an operating system that controls another operating system"	
a document organizing facility receiving documents from diverse applications in diverse formats specific to the respective applications;					
said document organizing facility automatically					

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
associating selected indicators with the received documents, automatically archiving the documents and indicators in consistent format for selective retrieval, and automatically creating information specifying respective glance views of said documents and respective document representations of said documents;					
a display facility displaying at least selected ones of said document representations;					
said display facility further displaying a cursor or pointer and responding to					

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
user-controlled sliding without clicking of the cursor or pointer over the displayed document representations to display at least a glance view of a document whose document representation is currently touched by the cursor or pointer; and					
said controlling operating system utilizing subsystems from said another operating system for operations including writing documents to storage media, interrupt handling and input/output.					
16. A controlling operating system utilizing subsystems from another operating					

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
system running a computer, comprising:					
a **document organizing facility** associating selected indicators with received or created documents and creating information specifying glance views of the respective documents and information specifying document representations of the respective documents;	9	document organizing facility	"software that organizes documents"	Document organizing facility is a means-plus-function limitation subject to § 112(6). Recited functions and structure are set forth below. Alternatively, if the Court finds this is not a means-plus-function limitation, Apple proposes the following construction: "the portion of a stream-based operating system whose purpose is to organize documents" In '427-16, the recited functions are: (a) associating selected indicators with received or created documents; and (b) creating information specifying glance views of the respective documents and information specifying document representations of the respective documents. There is no corresponding	

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
				structure. This phrase is indefinite.	
a display facility displaying at least selected ones of said document representations;					
said display facility further displaying a cursor or pointer and responding to a user sliding without clicking the cursor or pointer over a portion of a displayed document representation to display the glance view of the document whose document representation is touched by the cursor or pointer; and					
said controlling operating system utilizing					

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
subsystems from said another operating system for operations including writing documents to storage media, interrupt handling and input/output.					
25. A document stream operating system utilizing subsystems from another operating system running a computer, comprising:					
a **document organizing facility** associating chronological indicators with documents received from diverse applications in diverse formats and creating information specifying glance views of the	9	document organizing facility	"software that organizes documents"	Document organizing facility is a means-plus-function limitation subject to § 112(6). Recited functions and structure are set forth below. Alternatively, if the Court finds this is not a means-plus-function limitation, Apple proposes the following construction: "the portion of a stream-based operating system whose purpose is to	

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
respective documents and information specifying document representations of respective documents;				organize documents" In '427-25, the recited <u>functions</u> are: (a) associating chronological indicators with documents received from diverse applications in diverse formats; and (b) creating information specifying glance views of the respective documents and information specifying document representations of respective documents. There is no <u>corresponding structure</u>. This phrase is indefinite.	
a display facility displaying at least selected ones of said document representations as a receding, foreshortened stack of partly overlapping document representations such that only a part each document					

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
representation except the first one in the displayed stack is visible to a user;					
said display facility further displaying a cursor or pointer and responding to a user sliding without clicking the cursor or pointer over said displayed stack of document representations to display the glance view of the document whose document representation is currently touched by the cursor; and					
said document stream operating system utilizing subsystems from said another operating system for operations including writing					

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
documents to storage media, interrupt handling and input/output.					
32. A method of displaying heterogenous documents from different applications in a receding, foreshortened stack of selected document representations of said documents and providing **a set of commands applicable to the document representations in the stack**, comprising:		"a set of commands applicable to the document representations in the stack" '427- 32	"commands associated with operations that can be performed on the documents whose document representations are in the stack"		AGREED
first displaying document representations of said documents received from different applications as a receding, foreshortened					

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
stack of partly overlapping document representations such that only a part of each of most document representations in the displayed stack is visible to the user;					
said stack being in a time order related to respective time-based indicators automatically associated with the documents at the time of receipt or creation thereof;					
subsequently, while displaying the stack of document representations, responding automatically to touching a document representation in					

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
the stack with a user-operated cursor or pointer, without further action by the user, to display separately from the displayed stack of document representations, a glance view of the document whose document representation is currently touched by the cursor or pointer, said glance view being displayed while the displayed stack of document representations remains visible; and					
concurrently with displaying said glance view, displaying in the same display a set of command buttons, said command buttons					

Claim Language 6,725,427	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
being responsive to user clicks to cause respective operations to be performed on the document whose glance view is displayed at the time.					
34. A method as in claim 32 including visually identifying attributes of selected documents in the displayed stack of document representations by markings that are visible in the displayed stack, each **marking being common to a class of documents.**		"marking being common to a class of documents" '427-34	"marking in the same way document representations associated with documents having the same type or other characteristic"		AGREED

U.S. Patent No. 6,638,313

Claim Language 6,638,313	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
Claim 1: A method of utilizing a **document stream operating system** that in turn utilizes subsystems from at least one other operating system, comprising:	4	"document stream operating system" '313-1; and '427-25	same as "stream-based operating system"	same as "stream-based operating system"	
		"document" '313-1, 9; '427-1, 8, 16, 25, and 32	In certain places, listed below, "document" means "a document representation" as defined below: '313 claim 1 at 15:25, 15:25, 15:26; 15:31, 15:33 (*i.e.*, in the fifth and sixth paragraphs of the claim after the preamble); '313 claim 9 at 16:28, 16:28, 16:29; 16:34 (*i.e.*, in the final two paragraphs of the claim).		AGREED
receiving documents from diverse applications in formats that are specific to the respective applications and differ as between at least some of					

Claim Language 6,638,313	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
said applications;					
automatically associating **time-based indicators** with the documents received in the receiving step from the diverse applications; automatically archiving the received documents;		"time-based indicators" '313-1, 9; '427-2, 9, 17, and 32	"chronological indicators"		AGREED
automatically creating glance views that are abbreviated versions of respective ones of said documents;					
selectively displaying at least some of said documents as a receding, foreshortened stack of partly overlapping documents so that only a part of each					

Claim Language 6,638,313	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
of said documents in the displayed stack, after the first document in the stack, is visible to the user;					
said displaying further including displaying a cursor or pointer and responding to a user sliding the cursor or pointer over said displayed stack to display the glance view of the document in the stack that is currently touched by the cursor or pointer, without requiring clicking on the document; and					
utilizing, in said document stream operating system, subsystems from said at least one other operating system for					

Claim Language 6,638,313	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
operations including writing documents to storage media, interrupt handling and input/output.					
2. A method as in claim 1 including storing said documents as a main stream that is time-based and selectively generating a substream of documents that are a subset of the documents in the main stream matching selected criteria.					
3. A method as in claim 2 in which said generating a substream comprises generating a **substream that persists** unless selectively destroyed by a user.		"a substream that persists" '313-3	"a substream that is dynamically updated"		AGREED

U.S. Patent No. 6,768,999

Claim Language 6,768,999	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
A method of operating an **enterprise information management system** comprising at least one server and a number of personal computers selectively communicating with each other comprising:	12	"enterprise information management system" '999-1	"a system that manages information for an enterprise or organization"	"a system with a client-server architecture, a multi-computer, multi-node, high volume server, and a number of clients in the order of hundreds, rather than tens"	

Claim Language 6,768,999	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
creating document object models comprising selected information from and about **information assets** of diverse types, created by diverse software, said document object models having a consistent structure;		"information assets" '999-1	"data units of significance to the users in an enterprise"		AGREED
displaying **browse cards** related to respective ones of the information assets in a **time-ordered stream**,		"browse card" '999-1	same as "document representation"		AGREED
	1	"stream" '227-1, 13, 25; '313-1; '427-1, 20-24, 25, 37-39; and '999-1	In the '999 patent: "a time-ordered collection of information assets, unbounded in number, in which the time associated with an information asset can be in the past, present or future, and the location of file storage is transparent to the user"	"a time-ordered sequence of documents that functions as a diary of a person or an entity's electronic life and that is designed to have three main portions: past, present and future"	
		"time-ordered stream" '999-1	"a displayed stream in which the elements are arranged in time order"	same as "stream"	

Claim Language 6,768,999	Term #	Term	Mirror Worlds, LLC's Proposed Claim Construction	Apple Inc.'s Proposed Claim Construction	Court's Construction
together with glance views related to the **document object models** of the respective displayed documents,	13	"document object model" '999-1	"a consistent structure containing information about information assets of diverse types, created by diverse software"	"a consistent structure containing information about information assets of diverse types, created by diverse software, that includes items such as summary, type of document, owner, permissions, keywords, command options, timestamp, index, etc."	
said glance views being displayed **essentially in real time** in response to passing a cursor over respective ones of the browse cards.		"essentially in real time" '999-1	"without significant delay as perceived by a user"		AGREED

U.S. Patent No. 6,613,101

Claim Language 6,613,101	Term #	Term	Mirror Worlds Technologies, Inc.'s Proposed Construction	Apple Inc.'s Proposed Construction	Court's Construction
1. A method for organizing and viewing information in a computer filing system having a display device and a first plurality of documents, said method comprising:					
displaying **a graphical iconic representation of a collection of said first plurality of documents**;	14	"a graphical iconic representation of a collection of said first plurality of documents" '101-1, 5, 9	"a small static picture representing a collection of documents"	"a collection of two or more document icons displayed together"	
displaying a first indicia of a first document of said collection by selecting a first position from said graphical iconic representation, wherein said first					

Claim Language 6,613,101	Term #	Term	Mirror Worlds Technologies, Inc.'s Proposed Construction	Apple Inc.'s Proposed Construction	Court's Construction
position on said graphical iconic representation is capable of being at any one of a plurality of locations on said graphical iconic representation and wherein said selecting from said graphical iconic representation comprises positioning a cursor on said graphical iconic representation; and					
displaying in series a second indicia of a second document and a third indicia of a third document by positioning said cursor first on a second position on said graphical iconic					

Claim Language 6,613,101	Term #	Term	Mirror Worlds Technologies, Inc.'s Proposed Construction	Apple Inc.'s Proposed Construction	Court's Construction
representation next on a third position on said graphical iconic representation.					
2. A method as in claim 1 wherein said indicia is displayed **adjacent** to said graphical iconic representation of said collection.		"adjacent" '101-2, 4, 6, 8, 10, and 12	"close to"		AGREED
5. An apparatus for organizing and viewing information in a computer filing system having a display device and a first plurality of documents, said apparatus comprising:					
means for displaying a graphical iconic representation of a collection of said first plurality	15	"means for displaying a graphical iconic representation [of a collection of said first	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is displaying a	

Claim Language 6,613,101	Term #	Term	Mirror Worlds Technologies, Inc.'s Proposed Construction	Apple Inc.'s Proposed Construction	Court's Construction
of documents;		plurality of documents]" '101-5	recited <u>function</u> is displaying a graphical iconic representation of a collection of said first plurality of documents. The <u>corresponding structure</u> is executable code that displays the icon representing a collection of documents (*i.e*., pile), and equivalents thereof.	graphical iconic representation of a collection of said first plurality of documents. The <u>corresponding structure</u> is a video display screen, such as a video (CRT) display monitor or a liquid crystal display, coupled to a system bus that receives commands and data from a processor, and structural equivalents.	
means for displaying a first indicia of a first document of said collection by selecting a first position from said graphical iconic representation, wherein said first position on said graphical iconic representation is capable of being at any one of a plurality of locations on said graphical iconic representation and wherein said	15	"means for displaying a first indicia [of a first document of said collection by selecting a first position from said graphical iconic representation]" '101-5	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is displaying a first indicia of a first document of said collection by selecting a first position from said graphical iconic representation. The <u>corresponding structure</u> is executable code that initiates browsing of a pile after the cursor has been positioned over the iconic graphical representation of the collection of documents (pile) for a predetermined	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited <u>function</u> is displaying a first indicia of a first document of said collection by selecting a first position from said graphical iconic representation. The <u>corresponding structure</u> is (a) a video display screen, such as a video (CRT) display monitor or a liquid crystal display, coupled to a system bus that receives commands and data from a processor, and structural equivalents; and (b) an I/O controller to control signals received from a	

Claim Language 6,613,101	Term #	Term	Mirror Worlds Technologies, Inc.'s Proposed Construction	Apple Inc.'s Proposed Construction	Court's Construction
selecting from said graphical iconic representation comprises positioning a cursor on said graphical iconic representation; and			period of time and displays a first indicia of a first document of the collection (pile) by selecting a first position on the icon representing the collection, and equivalents thereof.	keyboard and/or a cursor control device and structural equivalents.	
means for displaying in series a second indicia of a second document and a third indicia of a third document by positioning said cursor first on a second position on said graphical iconic representation next on a third position on said graphical iconic representation	15	"means for displaying in series [a second indicia of a second document and a third indicia of a third document by positioning said cursor first on a second position on said graphical iconic representation next on a third position on said graphical iconic representation]" '101-5	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited function is displaying in series a second indicia of a second document and a third indicia of a third document by positioning said cursor first on a second position on said graphical iconic representation next on a third position on said graphical iconic representation. The corresponding structure is executable code that displays in series a second indicia of a second	The parties agree that this is a means-plus-function limitation subject to § 112(6). The parties agree that the recited function is displaying in series a second indicia of a second document and a third indicia of a third document by positioning said cursor first on a second position on said graphical iconic representation next on a third position on said graphical iconic representation. The corresponding structure is (a) a video display screen, such as a video (CRT) display monitor or a liquid crystal display, coupled to a system bus that receives commands and data from a processor, and	

Claim Language 6,613,101	Term #	Term	Mirror Worlds Technologies, Inc.'s Proposed Construction	Apple Inc.'s Proposed Construction	Court's Construction
			document and a third indicia of a third document by positioning a cursor first on a second position on the icon representing the collection (pile) and next on a third position on the icon representing the collection (pile), and equivalents thereof.	structural equivalents; and (b) an I/O controller to control signals received from a keyboard and/or a cursor control device (such as mouse, graphic tablet, touch tablets, trackballs, pen input mechanisms, or touch screens) and structural equivalents.	